2 3 4 5	Nevada Bar No. 004695 LAW OFFICE OF JULIE A. MERSCH 701 S.7th Street Las Vegas, NV 89101 (702) 387-5868 jam@merschlaw.com Attorney for Plaintiff Patricia Corbosiero			
6				
7	UNITED STATES DISTRICT COURT			
8	PATRICIA CORBOSIERO,  DISTRICT OF NEVADA  CASE NO.: 2:16-cv-00834-JCM-CWH			
9	Plaintiff,			
10	vs. STIPULATION AND ORDER TO EXTEND DEADLINES			
11 12	UNIVERSAL HEALTH SERVICES, INC., as Plan Administrator for the Universal (SECOND REQUEST)			
13 14 15 16	Health Services, Inc. Group Supplemental Dependent Life and Accidental Death and Dismemberment Plan for employees of Universal Health Services, Inc. ("Plans"); HARTFORD LIFE AND ACCIDENT INSURANCE CO., as Claims Administrator for the Plans; DOES I through X, and ROE CORPORATIONS I through X, inclusive,			
17 18	Defendants.			
IT IS HEREBY STIPULATED by the parties hereto, by and through their undersigned counsel of record that, pursuant to LR 26-4, the amended Scheduling Order dated October 17, 2016 (Doc. # 22) be amended as follows:  I. Case Status  Mediation between Plaintiff and Defendant HARTFORD is currently scheduled for				
<ul><li>24</li><li>25</li><li>26</li></ul>	January 24, 2017. The current scheduling deadlines regarding Plaintiff's first cause of action against Hartford will remain in force. Following the filing of the October 17, 2016			
	Scheduling Order, Plaintiff and Defendant UNIVERSAL HEALTH SERVICES, INC.			

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STIPULATION AND ORDER TO EXTEND DEADLINES (First Request)

(UHS) entered into settlement discussions. On October 27, 2016, Plaintiff presented a demand to UHS. Defendant UHS is currently considering Plaintiff's demand, but requires additional time for its consideration due to unforeseen delays.

## II. Reason for Request for Extension

Plaintiff's dispositive motion regarding her second cause of action against Defendant UHS is currently due by December 2, 2016. Plaintiff and UHS are currently attempting to resolve this claim and therefore propose that all briefing deadlines be extended into the new year.

## III. Proposed Discovery Schedule regarding Plaintiff's second cause of action against UHS only:

Plaintiff CORBOSIERO and Defendant UHS propose an approximately 5-week extension of their remaining deadlines (Doc #22, ¶ III. B):

<b>Description:</b>	<b>Current Deadline:</b>	<b>Proposed:</b>
Plaintiff's Dispositive Motion under Rule 52 and/or 56	12/02/16	01/09/17
UHS's opposition to Dispositive Motion	01/09/17	02/13/17
Plaintiff's Reply	01/30/17	03/06/17

We, the undersigned, represent to the Court that this request for extension is made in good faith and not for purposes of delay.

WHEREFORE, the parties jointly request that this Court adopt the proposed scheduling as indicated above.

DATED: November 30, 2016	LAW OFFICE OF JULIE A. MERSCH
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By:	/s/ Julie A. Mersch
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	Attorney for Plaintiff Patricia
	Corbosiero

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1	DATED: November 30, 2016	FORD HARRISON
2 3 4		By: /s/ Tiffany D. Downs TIFFANY D. DOWNS tdowns@fordharrison.com 271 17th Street NW, Ste. 1900 Atlanta, GA 30363
5		Eric Stryker, Esq.
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7		Wilson, Elser, Moskowitz, Edelman & Dicker, LLP
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9		Attorneys for Defendant UHS
10	DATED: November 30, 2016	LEWIS ROCA ROTHGERBER CHRISTIE
11		By: /s/ Ann-Martha Andrews ANN-MARTHA ANDREWS
12		Aandrews@lrrc.com Nevada Bar No. 7585
13		3993 Howard Hughes Pkwy., Ste. 600 Las Vegas, Nevada 89169
14		Attorneys for Defendant HARTFORD
15		IT IS SO ORDERED.
16		Dated December 1, 2016
17		Dated 2 seemed 1, 2016
18		Cust
19		UNITED STATES MAGISTRATE JUDGE
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